

## **EXHIBIT A**

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21 In re RIPPLE LABS INC. LITIGATION

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23 This Document Relates to:  
24 ALL ACTIONS

Case No. 4:18-cv-06753-PJH

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**DECLARATION OF ANA GUARDADO  
IN SUPPORT OF LEAD PLAINTIFF'S  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIALS SHOULD BE  
SEALED**

1 I, Ana Guardado, declare as follow:

2       1. I am Litigation Director at Ripple Labs Inc. I make this declaration in support of  
 3 Lead Plaintiff's Administrative Motion to Consider Whether Another Party's Materials Should  
 4 Be Sealed ("Motion to Seal"), Dkt. 239. Based on my personal experience, knowledge, and  
 5 review of the files, records, and communications in this case, I have personal knowledge of the  
 6 facts set forth in this Declaration and, if called to testify, could and would testify competently to  
 7 those facts under oath.

8       2. Lead Plaintiff's Motion to Seal seeks to redact portions of Joint Letter Brief filed  
 9 on April 17, 2023 and accompanying Exhibit A (the "Protected Materials"), described in greater  
 10 detail below. Defendants Ripple Labs Inc., XRP II, LLC, and Bradley Garlinghouse  
 11 (collectively, "Ripple") designated these documents as "CONFIDENTIAL" or "HIGHLY  
 12 CONFIDENTIAL – ATTORNEY'S EYES ONLY" under the Stipulated Protective Order as  
 13 Modified by the Court ("Protective Order"), Dkt. 143. I now submit this declaration in support  
 14 of the Motion to Seal.

15       3. I have reviewed each portion of the Protected Materials, which contain  
 16 information Ripple considers to be highly sensitive and confidential information, the disclosure  
 17 of which could result in competitive harm to Ripple. I submit that the Protected Materials should  
 18 be sealed for the reasons set forth in the below chart:

Type of Material Defendants Seek to Seal	Page/Paragraph/Exhibit Numbers to be Redacted or Sealed in Full
Documents or portions thereof describing or providing detailed information on Ripple's trade secret business information and highly sensitive internal strategy information, disclosure of which would be very likely to result in unjustified competitive harm.	Highlighted portions of Joint Letter Brief at pages 1, 2, 3, and 6. Exhibit A to Joint Letter Brief.

25       4. Ripple respectfully requests that the Court grant the Motion to Seal and allow the  
 26 Protected Materials to remain under seal.  
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1 I declare under penalty of perjury that the foregoing is true and correct. Executed this  
2 21st day of April, 2023, in San Francisco, California.  
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6 Ana Guardado  
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